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**Hearing Date: July 22, 2010 at 10:00 a.m.**  
**Objection Date: June 7, 2010 at 4:00 p.m.**

Attorneys for M.J. Celco, Inc.

**UNITED STATES BANKRUPTCY COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

In re:	)	
	)	
DELPHI CORPORATION, et al.,	)	Chapter 11
	)	Case No. 05-44481 (RDD)
Debtor.	)	(Jointly Administered)
	)	
DELPHI CORPORATION, et al.,	)	Adv. Pro.
	)	No. 07-02466 (RDD)
Plaintiffs,	)	
	)	
-against-	)	
	)	
MJ CELCO, MJ CELCO, INC.	)	
	)	
Defendant.	)	

**NOTICE OF MOTION OF MJ CELCO, INC. TO (A) VACATE CERTAIN PRIOR ORDERS OF THE COURT; AND (B) DISMISS THE COMPLAINT WITH PREJUDICE**

**PLEASE TAKE NOTICE THAT:**

Upon the annexed motion, dated May 14, 2010, Defendant MJ Celco, Inc. a/k/a MJ Celco, through its attorneys, Dykema Gossett PLLC, filed its Motion to (A) Vacate Certain Prior Orders of the Court; and (B) Dismiss the Complaint with Prejudice.

A hearing with respect to the Motion will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, of the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, on July 22, 2010 at 10:00 a.m. (Eastern Daylight Time), or as soon thereafter as counsel may be heard.

A copy of the Motion may be obtained by (a) contacting the attorneys for the Defendant, Robert D. Nachman, Dykema Gossett PLLC, 10 S. Wacker Drive, Suite 2300, Chicago, Illinois 60606, Telephone: (312) 627-2480; (b) accessing the Court's website at <http://www.nysb.uscourts.gov> (please note that a PACER password is needed to access documents on the Court's website); (c) viewing the docket of these cases at the Clerk of the Court, United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004; or (d) accessing the public website maintained by the Debtors' court-appointed claims and noticing agent in these cases at: [www.kccllc.net](http://www.kccllc.net)

The deadline to file any objections and responses to the Motion is June 7, 2010 at 4:00 p.m. (Eastern Daylight Time) (the "Objection Deadline").

Objections and responses, if any, to the Motion must be in writing and must (a) conform to the Bankruptcy Rules, the Local Rules of the Bankruptcy Court for the Southern District of New York, and any case management orders in these chapter II cases, (b) set forth the name of the objecting party, the nature and amount of claims or interests held or asserted by the objecting party against the Debtors' estates or property, and (c) set forth the basis for the objection and the specific grounds therefore.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-242, and on (i) Robert D. Nachman, Dykema Gossett PLLC, 10 S. Wacker Drive, Suite 2300, Chicago, Illinois 60606; (ii) the Debtors, DPH Holdings Corp. (f/k/a Delphi Corporation, et al.), Attn: John Brooks, 5725 Delphi Drive, Troy, Michigan 48098; (iii) Butzel Long, Attn: Cynthia J. Haffey, Esq., 150 W. Jefferson Avenue, Suite

100, Detroit, Michigan 48226; (iv) Butzel Long, Attn: Eric Fisher, Esq., 380 Madison Avenue, 22<sup>nd</sup> Floor, New York, New York 10017; (v) Latham & Watkins, attorneys for The Official Committee of Unsecured Creditors, Attn: Mark A. Broude, Esq. and Robert J. Rosenberg, Esq., 885 Third Avenue, New York, New York 10022 and Warner Stevens, L.L.P., Attn: Michael D. Warner, Esq., 301 Commerce Street, Suite 1700, Fort Worth, Texas 76102; (vi) the Office of the United States Trustee for the Southern District of New York, Attn: Alicia M. Leonhard, Esq., Tracy Hope Davis, Esq. and Brian Masumoto, Esq., 33 Whitehall Street, 21st Floor, New York, New York 10004, so as to be received no later than the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing. Failure to appear at the Hearing may result in relief being granted or denied upon default.

MJ CELCO, INC.

Dated: May 14 , 2010

DYKEMA GOSSETT PLLC

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